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The United States Olympic Committee and the
7 International Olympic Committee

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9 **UNITED STATES DISTRICT COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**
11 **SAN FRANCISCO DIVISION**

12 The United States Olympic
13 Committee and The International
14 Olympic Committee,

15 Plaintiffs,

16 v.

17 Xclusive Leisure & Hospitality Ltd.;
Beijingticketing.com; 2008-
olympics.com;
18 Beijingolympic2008tickets.com;
Beijingolympictickets2008.com;
19 Olympic-tickets.net;
Olympicticketsbeijing2008.com;
20 Does 1-10, inclusive,

21 Defendants.

Case No. C 08-03514 JSW

**DECLARATION OF ALAN HIBDON
IN SUPPORT OF PLAINTIFFS'
MOTION FOR A TEMPORARY
RESTRAINING ORDER**

1 I, Alan Hibdon, HEREBY DECLARE AS FOLLOWS:

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3 1. I am a resident of San Francisco, California. All of the facts set forth
4 herein are known to me personally and, if called as a witness, I could testify to them
5 competently.

6 2. On February 28, 2008, I placed an order for numerous tickets to the
7 upcoming Olympic Games on the BeijingTicketing.com website, including tickets
8 to the Opening Ceremony. I was not asked to provide a photograph or information
9 about my passport. The total cost of my order was \$12,390.

10 3. I am a (retired) software engineer. I have done web design and am
11 fairly cautious about purchasing tickets online. Before placing my order, I
12 reviewed the BeijingTicketing.com website fairly thoroughly. I found its
13 sophistication and thoroughness to indicate that it was a legitimate source of tickets
14 and specifically reviewed the site's "sporting and events calendar" several times,
15 which I viewed as a tool to facilitate purchasing decisions. In addition, the site was
16 at the top of Google search results for several months and I found favorable reviews
17 of the site on Google that I now believe to have been planted by the operators of the
18 site. I also saw the Olympic logo and assumed the site had authority to sell tickets
19 to the Olympic Games.


20 4. After placing my order, I was originally told my tickets would ship in
21 late June by Federal Express. I was later told that my tickets should ship on July
22 21, 2008, by noon by Federal Express. Since then I have had no response to my
23 many calls and emails.

24 5. I have not received any tickets from BeijingTicketing.com. By the
25 time I realized I had likely been scammed, it was too late to find replacement
26 tickets to the Opening Ceremonies.

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2 6. I contacted counsel for the United States Olympic Committee on
3 August 2, 2008.
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5 I declare under penalty of perjury under the laws of the United States that the
6 foregoing is true and correct.

7 Executed on this 4th day of August, 2008 at Beijing, China.
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10 Alan Hibdon
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